REMARKS

Claims 4, 8, and 13-23 are pending in the present application. Claims 1-3, 5-7, and 9-12 were previously canceled. By this submission, claims 4, 8, and 13 are amended and claims 14-23 are added. Reconsideration of the claims is respectfully requested in light of the following arguments.

Amendments are made to the specification to conform references to *customer* information terminal 132, rather than mixing this description with reference to a *client-side* information terminal. No new matter is added by any of the amendments to the specification.

The Examiner is thanked for the favor of an interview. Independent claims 4, 8, and 13 are amended, and claims 14-23 are added, taking into account the issues discussed in the interview.

I.   Objection to Drawings

The Office Action objects to the drawings for the following reasons:

- Page 21, line 8 of the Applicant's specification cites information terminals **130** yet none of the figures display such terminals. This is throughout the specification.

- Page 18, line 7 in the Applicant's specification cites information terminal support server **110**, yet none of the figures display such terminals. This is throughout the specification.

- Reference character **132** has been used to designate both agent information terminal and customer information terminal.

The Examiner is thanked for finding these errors in the drawings. Applicants submit a replacement formal drawing for FIG.2, as suggested by the Examiner. In this drawing, the agent information terminal has been renumbered as **130** and the reference number **110** has been added to the terminal support server.

II.   35 U.S.C. § 102, Anticipation: Claims 4, 8 and 13

II-A. Rejection over Tso

The Office Action rejects claims 4, 8, and 13 under 35 U.S.C. 102(e) as being allegedly anticipated by *Tso et al.* (U.S. Patent No. 6,421,733). This rejection is respectfully traversed.

Tso teaches a system for dynamically transcoding data transmitted between computers. *Tso* teaches a "smart proxy" that receives requests for content and transcodes the content, in addition to caching the content, before returning the content to the requesting device. *Tso* states:

> Embodiments of the present invention provide the ability to dynamically transcode information transmitted between, for example, a network server computer and a network client computer. As used herein, the term "transcode" applies to virtually any manipulation of data including, but not limited to, adding, modifying or deleting data.

Tso, col. 2, lines 43-48. Thus, *Tso* provides a general teaching of transcoding. However, this general teaching is not sufficient to anticipate the claimed invention. Anticipation focuses on whether a claim reads on the product or process a prior art reference discloses, not on what the reference broadly teaches. *Kalman v. Kimberly-Clark Corp.,* 713 F.2d 760, 218 U.S.P.Q. 781 (Fed. Cir. 1983).

In contradistinction, the present invention provides an information terminal support server that edits a message by embedding a command in association with content included in the message, wherein the command is executable at an information terminal to prohibit a behavior of a client program with respect to the content. As stated above, *Tso* provides a general teaching of transcoding; however, *Tso* does not teach or suggest embedding a command that is executable at an information terminal to prohibit a behavior of a client program with respect to content. For example, *Tso* teaches adding advertising to a message (see col. 8, lines 10-21), adding JavaScript that provides an interface for a user to change behavior of the transcoder at the proxy server (see col. 10, line 47, to col. 11, line 28), or deleting content (see col. 17, lines 11-15). While *Tso* teaches embedding instructions (JavaScript) into a message for other reasons, *Tso* does not teach or suggest embedding commands in association with pre-existing content in the message to prohibit a behavior with respect to the content.

Actually, *Tso* teaches away from the present invention because *Tso* teaches filtering or deleting undesired content rather than embedding a command to prohibit a behavior with respect to the content. Claims 8 and 14 recite subject matter addressed above with respect to claim 4 and are allowable for similar reasons. Therefore, Applicants respectfully request withdrawal of the rejection of claims 4, 8, and 13 under 35 U.S.C. § 102(e).

Furthermore, *Tso* does not teach, suggest, or give any incentive to make the needed changes to reach the presently claimed invention. *Tso* teaches manipulating the data passing through a server as opposed to a embedding a command to be executed by a program on an information terminal as in the presently claimed invention. Absent the Office Action pointing out some teaching or incentive to implement the embedding of a command in association with content to prohibit a behavior with respect to the content in *Tso*, one of ordinary skill in the art would not be led to modify *Tso* to reach the present invention when the reference is examined as a whole. Absent some teaching, suggestion, or incentive to modify *Tso* in this manner, the presently claimed invention can be reached only through an improper use of hindsight using Applicants' disclosure as a template to make the necessary changes to reach the claimed invention.

II-B. Rejection over Lincke

The Office Action rejects claims 4, 8, and 13 under 35 U.S.C. 102(e) as being allegedly anticipated by *Lincke et al.* (U.S. Patent No. 6,397,259). This rejection is respectfully traversed.

Like *Tso*, *Lincke* does not meet the limitation of editing said message to embed a command in association with content, wherein the command is executable at an information terminal to prohibit a behavior of a client program with respect to the content. *Lincke* merely teaches manipulating data that passes through a proxy server to conform with the constraints of a wireless device. For example, *Lincke* edits the information being sent to a user device if the device is not capable of using all of the information; one example discusses modifying the data to adjust for a small screen or lack of color (see col. 22, lines 25-55). *Lincke* teaches performing actions on the data, but does not teach editing a message to embed a command in association with content,

wherein the command is executable at an information terminal to prohibit a behavior of a client program with respect to the content. A prior art reference anticipates the claimed invention under 35 U.S.C. § 102 only if every element of a claimed invention is identically shown in that single reference, arranged as they are in the claims. *In re Bond*, 910 F.2d 831, 832, 15 U.S.P.Q.2d 1566, 1567 (Fed. Cir. 1990). All limitations of the claimed invention must be considered when determining patentability. *In re Lowry*, 32 F.3d 1579, 1582, 32 U.S.P.Q.2d 1031, 1034 (Fed. Cir. 1994). For the above reasons, *Lincke* does not anticipate claim 4.

Claims 8 and 13 recite subject matter addressed above with respect to claim 4 and are allowable for similar reasons. Therefore, Applicants respectfully request withdrawal of the rejection of claims 4, 8, and 13 under 35 U.S.C. § 102(e).

Furthermore, *Lincke* does not teach, suggest, or give any incentive to make the needed changes to reach the presently claimed invention. *Lincke* teaches the manipulation of data passing through a server, not the insertion of a command that is executable at an information terminal to prohibit a behavior of a client program. Absent the Office Action pointing out some teaching or incentive to implement the insertion of a command into the messages of *Lincke*, one of ordinary skill in the art would not be led to modify *Lincke* to reach the present invention when the reference is examined as a whole. Absent some teaching, suggestion, or incentive to modify *Lincke* in this manner, the presently claimed invention can be reached only through an improper use of hindsight using Applicants' disclosure as a template to make the necessary changes to reach the claimed invention.

III. **New Claims**

Since claims 14-23 depend from claims 4, 8, and 13, the same distinctions between the applied references and the claimed invention as discussed above are applicable for these claims. Additionally, newly added dependent claims 14-23 provide additional subject matter not shown or suggested in the applied art.

More particularly, claims 14-16 and 18-23 provide further limitations to the content and the behavior being prohibited. Claims 14, 18, and 21 each recite wherein the content is a specified field and wherein the behavior is displaying the specified field. Claims 15, 19, and 22 each recite wherein the content is a form and wherein the behavior

is alteration of the form. Claims 16, 20, and 23 each recite wherein the content is a form and wherein the behavior is submission of the form.

Neither *Tso* nor *Lincke* discusses embedding a command into a message to prohibit a behavior of a client program on an information terminal as specifically recited in claims 14-16 and 18-23. Nor do these references provide any suggestion that such a command would be desirable.
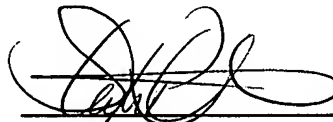
IV. Conclusion

It is respectfully urged that the subject application is patentable over the prior art of record and is now in condition for allowance.

The Examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the Examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

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Respectfully submitted,

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<u>AMENDMENTS TO THE DRAWINGS</u>:

The attached sheet of drawings includes changes to Fig. 2. This sheet, which includes Fig. 2, replaces the original sheet including Fig. 2. In Figure 2, the agent information terminal previously shown as reference number 132 has been changed to reference number 130. Additionally, the information support terminal has now been designated as 110.